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October 16, 2020

VIA ECF

Hon. Indira Talwani
Courtroom 9
US District Court for District of Massachusetts
Moakley Courthouse
1 Courthouse Way
Boston, MA 02210

Re: **Mirabella v. Tompkins, et alii.,**
C.A. No. 20-11520-IT

Dear Judge Talwani,

The Court appointed me as *pro bono* counsel for the plaintiff on August 26, 2020. I am writing on behalf of the plaintiff and defendant Sheriff Tompkins to request that the Court schedule a hearing on the plaintiff's motion for preliminary injunction for Friday, October 23, 2020, or any available day immediately thereafter.

The plaintiff filed his complaint and motion for preliminary injunction on August 13, 2020. After my appointment on August 26, we discussed the matter with the defendant's counsel. The defendant waived service on October 6, 2020. The plaintiff is anxious to have his motion heard; the defendant intends to oppose it. The parties are in need of input from the Court to move the matter forward.

I also request that the Court secure remote attendance of the plaintiff to participate in the hearing. He is the indispensable source of the first-hand information about his claims.

We thank you for your attention and consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Pavel Bessalko', written over a light blue background.

Pavel Y. Bessalko

cc. Melissa Garand, Esq. (via ECF)
Mr. Dante Mirabella